1	Kevin P. Roddy (Cal. Bar No. 128283)				
2	WILENTZ, GOLDMAN & SPITZER, P.Al. 90 Woodbridge Center Drive, Suite 900 Woodbridge NJ, 07005				
3	Woodbridge, NJ 07095 Telephone: (732) 636-8000				
4	Facsimile: (732) 726-6686 kroddy@wilentz.com				
5	Natalie Finkelman Bennett				
6	Admitted pro hac vice SHEPHERD, FINKELMAN,				
7	MILLER & SHAH, LLC 35 E. State Street				
8	Media, PA 19063 Telephone: 610/891-9880				
9	Facsimile: 610/891-9883 nfinkelman@classactioncounsel.com				
10	Attorneys for Plaintiff				
11	[Other counsel appear on signature page]				
12	UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA				
13		1			
14	In Re DYNAMIC RANDOM ACCESS MEMORY (DRAM) ANTITRUST	Master File No. M-02-1486-PJH			
15	LITIGATION	MDL No. 1486			
16	This Document Relates To:	STIPULATION			
17	CENTERPRISE INT'L, LTD.				
18	Docket No. 3:05cv3026				
19	STIDIII ATION OF TIME T	O ANGWED DIEAD MOVE			
20	STIPULATION OF TIME TO ANSWER, PLEAD, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT				
21					
22	Attorneys for the Plaintiff and the Defendants stipulate and agree that the Defendants shall				
23	have until October 3, 2005 to answer, plead, move, or otherwise respond to the Complaint in this				
24	action.				
25	Defendants agree that they will not assert any defense that may be available to them on				
26	grounds of possible insufficiency of service of process. No Defendant waives, and each Defendant				
27					
20	expressly preserves, all other rights and defenses that might be available to it, including without				

1	limitation any defense that might be available on grounds of lack of jurisdiction. The effective date		
2	of service on all Defendants shall be deemed to be September 13, 2005 by virtue of the waiver of		
3	service by each Defendant, for purposes of this action only.		
4	In the event that any Defendant responds to the Complaint by filing a motion, Plaintiff may		
5 6	serve a response in opposition to any motions within 60 days after service. The moving Defendant		
7	shall have 30 days to file a reply brief in support of its motion.		
8			
9	Dated: August 5, 2005		
10	WILENTZ, GOLDMAN & SPITZER, P.A.	SHEPHERD, FINKELMAN,	
11	By: _s/Kevin P. Roddy	MILLER & SHAH LLC	
12	Kevin P. Roddy	By: <u>s/Natalie Finkelman Bennett</u> Natalie Finkelman Bennett	
13	90 Woodbridge Center Drive, Suite 900		
14	Woodbridge, NJ 07095	35 E. State Street Media, PA 19063	
15	Plaintiff's Counsel	Admitted pro hac vice	
16	Trainent 5 Counsel		
17	GIBSON DUNN & CRUTCHER LLP	ORRICK, HERRINGTON & SUTCLIFFE	
18	By: <u>s/Joel Sanders</u> Joel S. Sanders	LLP	
19	Joel S. Sanders	By: s/Robert Freitas	
20	One Montgomery Street	Robert E. Freitas	
21	Montgomery Tower, 31st Floor San Francisco, CA 94104	Howard M. Ullman The Orrick Building	
	ADVOLD & DODTED LLD	405 Howard Street	
22	ARNOLD & PORTER LLP Ronald C. Redcay	San Francisco, CA 94105	
23	777 South Figueroa Street, 44th Floor	Address and Gov Defendents Newson Technical	
24	Los Angeles, California 90017-2513	Attorneys for Defendants Nanya Technology Corporation and Nanya Technology	
25	Attorneys for Defendants Micron Technology, Inc., Micron Semiconductor	Corporation USA	
26	Products, Inc., and Crucial Technology, an unincorporated division of Micron		
27	Semiconductor Products, Inc. (which joins in this stipulation to the extent that it may		
28	deemed a proper party)		
	_		

1		
2	KAYE SCHOLER LLP	THELEN REID & PRIEST LLP
3	By: <u>s/Julian Brew</u> Julian Brew	By:s/Robert Pringle
4	Aton Arbisser	Robert B. Pringle
	Tanja Shipman	Paul R. Griffin
5	1999 Avenue of the Stars, Suite 1600 Los Angeles, CA 90067	101 Second Street, Suite 1800 San Francisco, CA 94105-3601
6	KIRKLAND & ELLIS	~ · · · · · · · · · · · · · · · · · · ·
7	Saretta McDonough 777 South Figueroa Street	Attorneys for Defendants Elpida Memory,
8	Los Angeles, CA 90017-2513	Inc., Elpida Memory (USA) Inc., and NEC Electronics America, Inc.
9	Tefft W. Smith	
10	Karen N. Walker 655 Fifteenth Street, N.W.	
11	Washington, D.C. 20005-5793	
12	Attorneys for Defendants Infineon	
13	Technologies North America Corp. and	
	Infineon Technologies AG	
14	O'MELVENY & MYERS LLP	
15	By: s/Daniel L. Alexander	FINNEGAN, HENDERSON, FARABOW,
16	Daniel L. Alexander	GARRETT & DUNNER LLP
17	Kenneth R. O'Rourke	By: <u>s/Steven Morrissett</u> Steven H. Morrissett
18	400 South Hope Street Los Angeles, CA 90071-2899	
19		700 Hansen Way Palo Alto, CA 94304
20	Ian Simmons 1625 Eye Street, Northwest	COLLETTE, ERICKSON, FARMER &
21	Washington, DC 20006	O'NEILL LLP William Farmer, Jr.
		235 Pine St, Suite 1300 San Francisco, CA 94104
22	PILLSBURY WINTHROP SHAW	5411 Francisco, CA 74104
23	PITTMAN LLP Terrence A. Callan	
24	Albert J. Boro, Jr. 50 Fremont Street	Attorneys for Defendants Winbond Electronics Corporation and Winbond
25	P.O. Box 7880	Electronics Corporation America
26	San Francisco, CA 94120-7880	
27	Attorneys for Defendants Hynix	
28	Semiconductor, Inc. and Hynix Semiconductor America, Inc.	
_~	~ January Inc.	

1		
2	SHEPPARD, MULLIN, RICHTER & HAMPTON LLP	TOPEL & GOODMAN
3	By: <u>s/James McGinnis</u> James L. McGinnis	By: <u>s/William Goodman</u> William M. Goodman
4		832 Sansome Street, 4th Floor
5	Gary L. Halling Four Embarcadero Center, 17th Floor San Francisco, CA 94111-4106	San Francisco, CA 94111
6		Attorneys for Defendants Mosel Vitelic Incorporated and Mosel Vitelic Corporation
7	AKIN GUMP STRAUSS HAUER & FELD LLP	
8	Jonathan M. Jacobson Stephen A. Mansfield	
9	Robert B. Humphreys 590 Madison Avenue New York, NY 10022	
10		
11	Attorneys for Defendants Samsung Electronics Co., Ltd. and Samsung Semiconductor, Inc.	
12		
13		
14		
15	SO ORDERED:	
16	Mr	August 19
170	Phyllis J. Hamilton, J. U.S.D.C.	Date:, 2005
18		
19		
20		
21		
23		
24		
25		
26		
27		
28		
20		